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CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTA

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

TANYA R. LANGAMA
Plaintiff(s),

vs.

North Memorial Hospital
Dr. Gregory U. Vitas
Dr. Nathan Noznesky
Fairview University Vam Hospital
Dr. Henry Buchwald

Case No. 14cv4562 DWF/FLN
(To be assigned by Clerk of District Court)

DEMAND FOR JURY TRIAL

YES ☒ NO ☐

Defendant(s).

(Enter the full name(s) of ALL defendants in
this lawsuit. Please attach additional sheets
if necessary).

Amend
COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name TANYA Renee LANGAMA
Street Address 5501 Boone Ave N #202
County, City Hennepin, New Hope
State & Zip Code MN 55428
Telephone Number 612-207-4014

SCANNED

DEC 15 2014

U.S. DISTRICT COURT ST. PAUL

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name North Memorial Hospital
Street Address 3300 Oakdale Ave North
County, City Hennepin, Robbinsdale
State & Zip Code Minnesota, 55422

b. Defendant No. 2

Name Dr. Gregory N. Uitas
Street Address 3366 Oakdale Ave. North #502
County, City Hennepin, Robbinsdale
State & Zip Code Minnesota, 55422

c. Defendant No. 3

Name Dr. Nathan Noznerky
Street Address 3300 Oakdale Ave North
County, City Hennepin, Robbinsdale
State & Zip Code Minnesota 55422

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

U of M Hospital
Name - Dr. Henry Buchwald, and their attorneys at

Street address 701 Xenia Ave. South, Suite 500

County, Hennepin, Minneapolis

State & Zip Code. Minnesota 55416

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal Question

☒ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name:

State of Citizenship:

Defendant No. 1:

State of Citizenship:

Defendant No. 2:

State of Citizenship:

Attach additional sheets of paper as necessary and label this information as paragraph 5.

Check here if additional sheets of paper are attached. ☐

6. What is the basis for venue in the District of Minnesota? (check all that apply)

☒ Defendant(s) reside in Minnesota

☒ Facts alleged below primarily occurred in Minnesota

☐ Other: explain

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

① On March 6, 2008 and again on March 7, 2008, His failure to recommend urgent surgery led to my subsequent devastating complication. His treatment did not meet the standard of care required by a general surgeon with experience by Dr. Vitas. Then on March 6, 2008 Dr. Noznesky he overvaluated me and he failure to recommend urgent surgery also led to me having subsequent devastating complications. His treatment did

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② not meet the standard of care required by a general surgeon with his experience.

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

- ① The standard of care was not met by a general surgeon.
- ② Dr. Vitas & Dr. Noznesky did not detect when the bloody stool which would lead to intestinal ischemia.
- ③ These complications could have been avoided if the surgeon's would have elected surgery on the second day.
- ④ Dr. Angstadt's affidavit of opinion appeared to satisfy Minn. Stat. 45F.02, and establish the basis for a viable claim of medical negligence against Dr. Noznesky and Dr. Vitas.
- ⑤ It is therefore interests of justice to grant Plaintiff's motion to amend, and the motion should be granted.

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

I would like Court to pay close attention to the facts and honor Judge Bruce A. Peterson orders and forget about Judge Allen Jordan. I was missed my case. I would like a jury trial. And I would like to be compensated \$25,000,000. This done would be enough to start a life that they took away from me with my kids and family.

Signed this 13th day of December

Signature of Plaintiff Sanya Renee Sangane

Mailing Address 5501 Boone Ave N #202
New Hope, MN 55428

Telephone Number 612-207-4014

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.